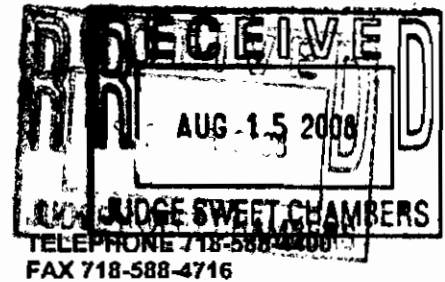


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August 15, 2008

Hon. Robert W. Sweet
Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: United States v. Shaun Dozier
08Cr. 008 (RWS)

Your Honor:

*The trial is
adjourned three weeks
to October 6. So
order
Sweet
USDJ
8.20.08
and the speedy trial clock
stops it*

I am writing to you seeking an adjournment and extension of time on the above noted matter. The case against my client, Shaun Dozier, is currently scheduled to commence trial on September 15, 2008. I have not made any previous requests for an adjournment of trial. I have discussed this request with the government and have been informed that they would not consent. The reason for this request is as follows.

Mr. Dozier is charged with having been part of a drug conspiracy and he alone is also charged, in the tenth count of the indictment, with possessing a firearm in furtherance of that conspiracy. Specifically, the allegation is that Shaun Dozier discharged that weapon and shot someone in the leg. On May 30, 2008 I wrote to the government seeking copies of, among other things, all the police reports which were generated as a result of that shooting. The government's response was that they were aware of their obligations but they had none of the requested materials.

Today, I received a one page report, relative to the shooting that Shaun Dozier is alleged to have committed, from the government which is entitled "Follow-up No. 30" (indicating that there are at least 29 other reports on file concerning that shooting). That report states that a named individual identified a male Hispanic named Big Boo who has a tattoo of two teardrops under one eye, as the shooter, not the defendant.

The need for the defense to conduct further investigation should be evident. It is critical that defense investigators be given sufficient time to follow up and develop this information for defense purposes. (Of course, it might speed things up a little if the government would be more forthright and provide the defense with all the police reports which were filed concerning this shooting).

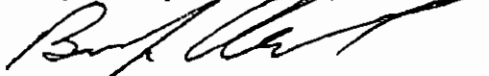
The Court should also be apprised that the government sent this office a disc containing hundreds of recordings of the defendant's telephone calls from MDC. That recording was received just last week and contains hours of conversations which must

be listened to and reviewed. That is a time consuming process. Counsel is leaving for a two week vacation this Sunday August 17th and will not return until after Labor Day,

I trust that above will answer the Court's need to know the necessity of this request for an adjournment of the trial date. I have discussed this request with Shaun Dozier and he agrees to the exclusion of speedy trial time until the date next set by the Court. I ask this Court to recognize that the adjournment requested will serve the ends of justice.

I have attached herewith a proposed revised scheduling order in accordance with Your Honor's individual practice rules.

Respectfully submitted,



Benjamin Heinrich
BH/ut

Encl.:

cc.: AUSA RANDALL WADE JACKSON